

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TRAVIS MICKELSON, DANIELLE H.
MICKELSON, and the marital community
thereof,

Plaintiffs,

v.

CHASE HOME FINANCE LLC, et al.,

Defendants.

No. C11-01445 MJP

DECLARATION OF THOMAS E.
REARDON IN SUPPORT OF
PARTIAL MOTION TO DISMISS
UNDER FED. R. CIV. P. 12(b)(6)

I, Thomas E. Reardon, declare:

1. ***Identity of Declarant.*** I, Thomas Reardon, am employed as an Assistant Vice President with JPMorgan Chase Bank, N.A. ("Chase"). In my position and as part of my employment, I work on issues that give me familiarity with and access to loan files documents in Chase's possession. Except as otherwise indicated, all facts set forth in this declaration are based on my personal knowledge, which is based on my experience, my review of relevant documents, including Chase's loan servicing records for Travis and Danielle Mickelson, and my discussions with appropriate personnel. The facts and documents set forth below are maintained in the ordinary course of business, and if called upon to testify regarding such matters, I could competently do so.

2. ***Adjustable Rate Note.*** Attached as **Exhibit A** is a true and correct copy of the Mickelsons' Adjustable Rate Note, endorsed in blank and made payable to bearer, evidencing

1 their debt.

2 3. **Deed of Trust.** Attached as **Exhibit B** is a true and correct certified copy of the
 3 Deed of Trust that secured the Mickelsons' Adjustable Rate Note for a home refinance loan.
 4 The debt was evidenced by the Note. The Deed of Trust was recorded on November 29, 2005,
 5 under Island County Auditor's File No. 4155570.

6 4. **February 5, 2009 Letter.** Attached as **Exhibit C** is a true and correct copy of a
 7 letter Chase Home Finance sent the Mickelsons, dated February 5, 2009, with the terms of a
 8 loan modification and unsigned copies of the loan modification agreement.

9 5. **February 20, 2009 Letter.** Attached as **Exhibit D** is a true and correct copy of a
 10 letter Chase Home Finance sent the Mickelsons, dated February 20, 2009.

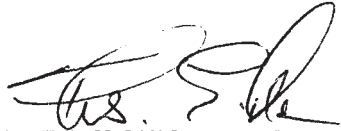
11 6. **Returned February 5, 2009 Letter.** Attached as **Exhibit E** is a true and correct
 12 copy of the February 5, 2009 letter and signed loan modification agreement, which the
 13 Mickelsons signed and dated on March 24, 2009.

14 7. **Forbearance Plan Agreement.** Attached as **Exhibit F** is a true and correct copy
 15 of the Forbearance Plan Agreement that Chase sent the Mickelsons, dated October 26, 2009.

16 8. **Chase Modification Program Trial Plan Offer – Notice of Expiration.**
 17 Attached as **Exhibit G** is a true and correct copy of the Notice of Expiration Chase sent the
 18 Mickelsons, dated July 20, 2010.

19
 20 I declare under penalty of perjury under the laws of the United States that the foregoing
 21 is true and correct to the best of my knowledge and belief.

22 EXECUTED at Westerville, Ohio, this 28th day of December, 2011

23
 24 

25 Thomas E. Reardon

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on December 29, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

- **Heidi E. Buck**
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and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

DATED this 29th day of December, 2011.

Davis Wright Tremaine LLP
Attorneys for Defendants JPMorgan Chase Bank,
N.A.; Mortgage Electronic Registration Systems
Inc.; and Federal Home Loan Corporation

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